

January 30, 2025

## To via ECF:

Hon. Arun Subramanian, U.S.D.J. **United States District Court** Southern District of New York 500 Pearl St. New York, New York 10007

> Re: Golden Foothill Insurance Services, LLC et al v. Spin Capital,

LLC et al

Docket No.: 24-cv-8515 (AS)

Letter Motion re Extension of Time for Defendants to Respond to

Amended Complaint

Dear Judge Subramanian,

My office, Murray Legal, PLLC, was just retained to represent Defendants BMF Advance LLC and Gavriel Yitzchakov. I write to request that the Court extend time until February 28, 2025, for our clients to respond to Plaintiffs' Amended Complaint (ECF Doc. 11). I spoke with counsel for Plaintiff via telephone and he has consented to this request. There have been no prior requests for an extension.

Assuming arguendo the validity of service, the original deadline to respond would have been January 2, 2025. The reason for the request is that my clients contend that they never received the Summons and were not aware of service. I need the time to review this docket, the lengthy Amended Complaint and exhibits, to familiarize myself with the Individual Rules for this Court and prepare a pre-answer motion to dismiss. Thank you for your attention to this matter.

Sincerely,

/s/ Christopher R. Murray

Christopher R. Murray, Esq.

CC via ECF:

Counsel for all parties

SO ORDERED. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 52.

Arun Subramanian, U.S.D.J.

Date: January 31, 2025

